United States District Court

SOUTHERN DISTRICT OF NEW YORK

SCANN

Michael Danieli, on behalf of himself and those similarly situated,

Plaintiff,

Defendant

- against -

International Business Machines

Corporation

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Piper Hoffman

a member in good standing of

the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Jahan C. Sagafi

Firm Name:

Lieff, Cabraser, Heiman & Bernstein, LLP

Address:

275 Battery Street, 30th Floor

City/State/Zip:

San Francisco, CA 94111

Phone Number:

(415) 956-1000

Fax Number:

(415) 956-1008

Jahan C. Sagafi

is a member in good standing of the Bar of the States of

California

There are no pending disciplinary proceeding against Jahan C. Sagafi in any State or Federal court.

Dated: May 21, 2008

City, State: New York, NY

Respectfully submitted,

Sponsor's Piper Hoffman

SDNY Bar PH 4990

Firm Name: Outten & Golden LLP

Address: 3 Park Ave., 29th Floor

City/State/Zip: New York, NY 10016

Phone Number: (212) 245-1000

Fax Number: (212) 977-4005

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